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Federal Communications Commission Office of the Secretary

# 2003 NANPA Performance Evaluation Report

Prepared by the Numbering Oversight Working Group

July 8, 2004

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#### **Executive Summary**

During 2003, NeuStar as the North American Numbering Plan Administrator (NANPA) started a new term as administrator of the North American Numbering Plan (NANP) under contract to the FCC. The NANPA's annual performance assessment is based upon results from performance ratings compiled from Performance Feedback surveys, observations and written comments. The NANC's Numbering Oversight Working Group (NOWG) has compiled this data into an annual report for the FCC and the North American Numbering Council (NANC).

NANPA's rating for the 2003 performance year was determined by the NOWG to be between "More than Met" and "Exceeded". This rating is defined below:

MORE THAN MET	<ul> <li>Met and sometimes went beyond the requirements for the position.</li> <li>Sometimes provided more than what was required to be considered fully successful in all aspects of the position.</li> <li>Performance was more than competent and reliable.</li> <li>Decisions and recommendations were sound in routine areas, and were frequently sound in the less structured, non-routine areas.</li> </ul>
EXCEEDED	Exceeded performance requirements consistently.  Exceeded performance even in the most difficult and complex situation  Taking on responsibility for extra or unique tasks.  Decisions and recommendations were always sound and exceeded requirements in less structured, non-routine areas of responsibilities.

The NOWG believes that NANPA has successfully addressed many issues during the year 2003. Some issues resulted in changes to the Central Office Code Administration Guidelines (COCAG) since the situations creating the need for change were unanticipated by the industry and NANPA. Other issues were resolved quickly by NANPA with little or no interaction with the NOWG and/or other groups.

Some suggested areas for continuous improvement were identified through survey comments, NOWG observations and NANPA operational reviews. Details of those findings, observations, and specific recommendations are included throughout this report. NANPA continued to improve during 2003 and certain areas have been suggested for inclusion in the 2004 NANPA Performance Improvement Plan (PIP).

The following comment is noteworthy for the 2004 continuous improvement plan:

 NANPA should work with the industry and regulatory community to improve the reclamation reporting process.

The NOWG believes the high level of client satisfaction revealed in the survey results is due to the perseverance, outstanding professionalism and expertise exhibited by NANPA personnel while performing NANPA duties.

It is recommended that the NOWG and NANPA work together to review the recommendations and suggestions provided in this report to develop the 2004 NANPA PIPs.

### Section 1.0 Performance Review Methodology

The annual NANPA performance evaluation is a summary of significant events that were accomplished during the 2003 performance year. In addition to the annual performance review survey process, the NOWG included its interactions with NANPA, such as the monthly NOWG/NANPA status meetings, for inclusion in this report.

The NOWG will present its preliminary findings to the FCC and NANPA. The final report will be presented to the NANC for endorsement and forwarding to the FCC. Subsequently, a 2004 Performance Improvement Plan (PIP) will be developed by NANPA for consideration and implementation.

#### Section 2.0 NANPA Reports

#### 2.1 NANPA Annual Report

The NANP Administration Requirements Document outlines the minimum components for the NANPA Annual Report. NANPA's 2003 Annual Report is complete and professionally published. The report is published annually, reporting on the state of the NANP and all its numbering resources, and contains, at a minimum, the following information:

- Brief description of the North American Numbering Plan, history, and funding
- Activity highlights and challenges for 2003
- Current NPA code listings alphabetical by State/Province and numerical
- Numbering Resource Utilization/Forecasting (NRUF) results current year forecast
- NPA code exhaust projections
- Status of NPA codes planning or in relief planning
- Dialing plans
- Description of all numbering resources assigned by the NANPA and appropriate point of contact to obtain
- Appendix of reference documentation to assist numbering resource users

The NANPA's 2003 Annual Report addresses all nine of the required items and at the same time conforms to the new NANPA Technical Requirements Document issued by the FCC on June 13, 2002.

The NANPA's 2003 Annual Report is available at <a href="http://www.nanpa.com/">http://www.nanpa.com/</a>.

# 2.1 Monthly Reports

The NANPA reports bi-monthly to the NANC on the status of its' numbering activities and consistently completed and delivered the reports on time. Additionally, the NANPA reports monthly to the NOWG on the status of its numbering activities and performance metrics. The NANPA reports on the following:

- 1) Central Office Code Activity Report
- 2) NPA Relief Planning Report
- 3) 2003 NPA Exhaust Forecasts
- 4) NeuStar Neutrality Reports
- 5) AOCN Administration

All sections of the reports have been thorough and accurate. The summary of the Central Office Code Assignments has been informative to the NANC participants. The NPA Relief Planning report is inclusive of the climate of relief today and the projected exhaust reports have been useful. At times the NANC directed the NANPA to provide additional detail on subjects of interest (i.e. grandfathered code list) which may be over and above the scope of their general responsibilities.

The NOWG / NANPA have developed a standing agenda that is followed during the scheduled monthly calls. The NANPA prepares monthly performance and status reports for the NOWG which are reviewed in depth during the monthly call. The quality and content of these reports have provided the NOWG with valuable insight into the operations of the NANPA. See Appendix A for the standing agenda.

### Section 3.0 Performance Improvement Plan

The 2002 NANPA Performance evaluation resulted in recommendations for improvement which NANPA incorporated into their 2003 Performance Improvement Plan (PIP).

The 2003 PIP covered the following areas:

- Code Administration System (CAS)
- Code Administration
- Data Integrity
- NANPA Website
- NPA Relief Planning
- NRUF
- General
- Other NANPA Initiatives (not evaluation driven)

The majority of the PIPs have been successfully implemented by the NANPA.

While the data integrity PIP has been closed, there is still some concern that the data discrepancies will continue. During the Operational Review session NANPA informed the NOWG that NAS would resolve the data discrepancies.

The NOWG recommends that any currently known data discrepancies continue to be worked towards resolution by NANPA. The NOWG further recommends that the data integrity and discrepancy issue be closely monitored by the NANPA, so that if need be, this PIP can be reopened.

See Appendix B for the final 2003 PIP report.

#### Section 4.0 2003 Performance Survey Results

The NOWG developed the annual survey from input from the NANPA that included sections dedicated to measuring NANPA's performance in delivering:

- CO Code Administration
- NPA Relief Planning
- NRUF Services, and
- Administration of Other NANP Resources

See Appendix C for a copy of the 2003 NANPA Performance Survey and cover letter.

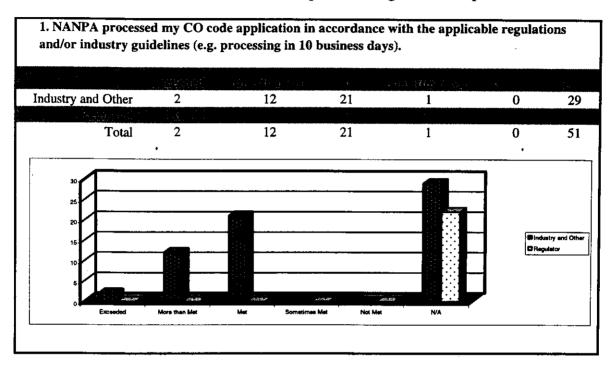
Also see Appendix D for a list of comments submitted by Respondents.

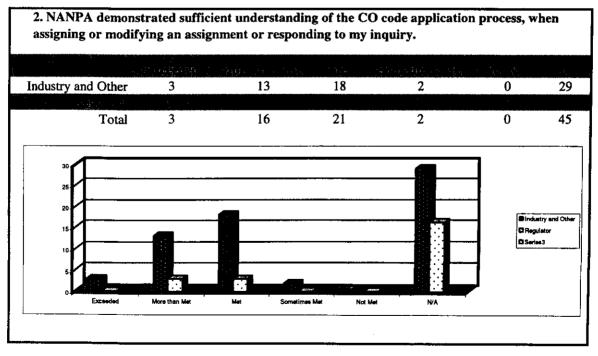
#### 4.1 Survey Ratings – Quantitative Analysis

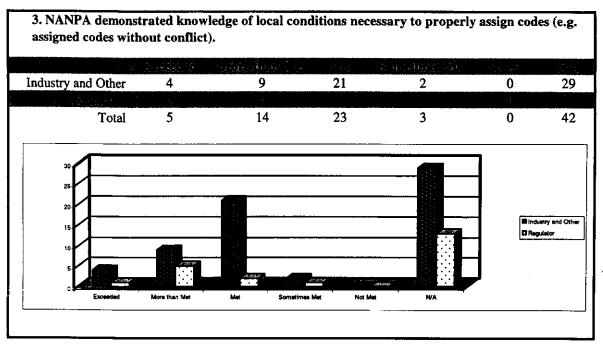
The numerical ratings reflect the degree of satisfaction experienced by respondents within each NANPA functional area. Respondents provided ratings to questions addressing CO Code Administration, NPA Relief Planning, NRUF, Other NANP Resources and Overall Assessment of NANPA. The following charts represent the aggregate of all responses to each of the questions. Survey responses were aggregated and are shown below for each survey question. The N/A category reflects responses when the respondents were not involved with that specific functional area. There were also some surveys submitted where no response was provided for entire sections and/or for individual questions.

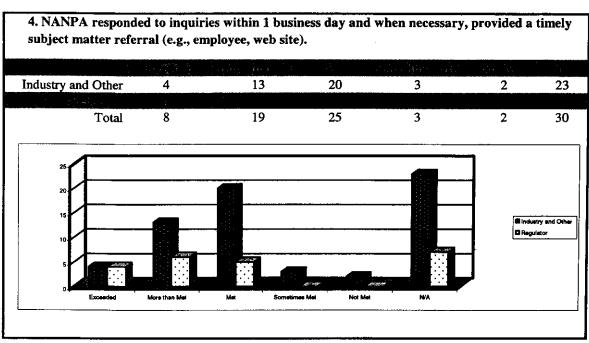
## CO Code Administration (Section A)

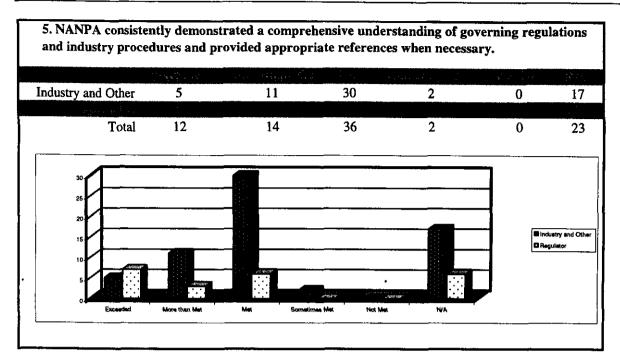
The ratings provided by respondents in this section were highly weighted in the Met or More than Met. There were over 50 cumulative responses rating NANPA's performance as Exceeded.

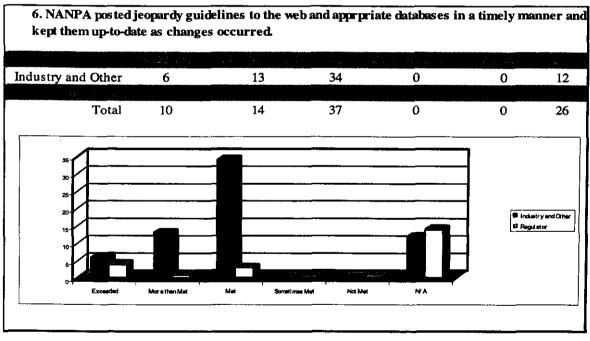


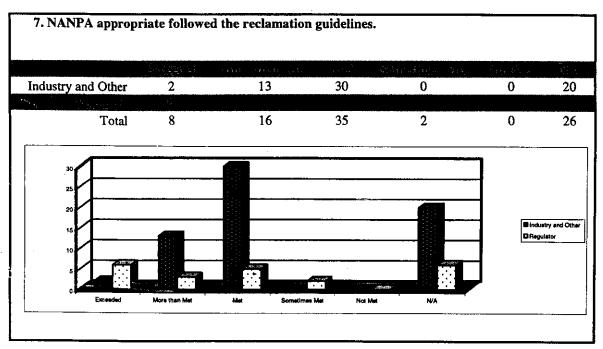


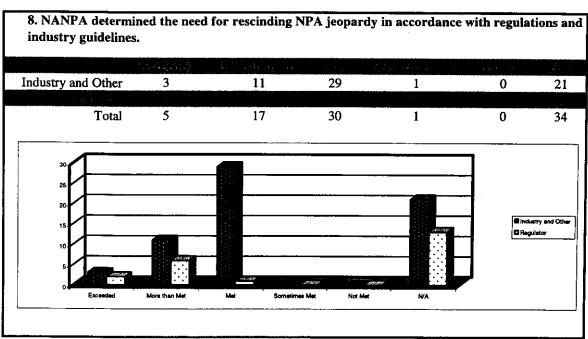


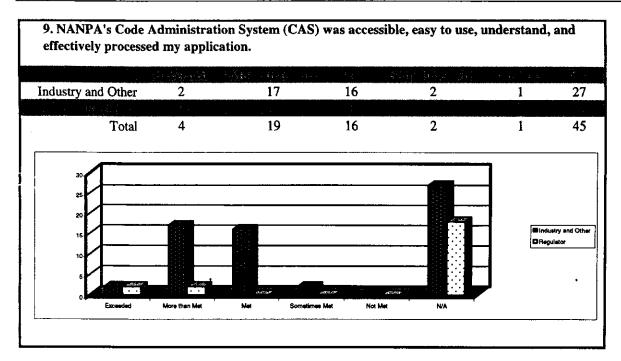


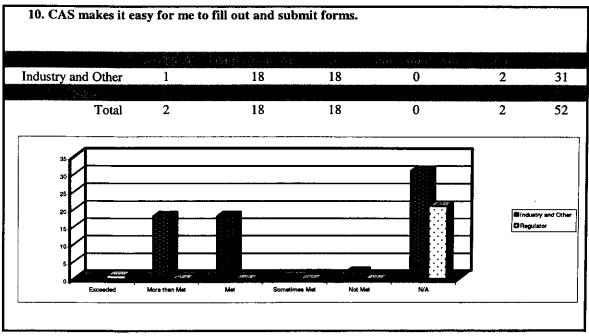


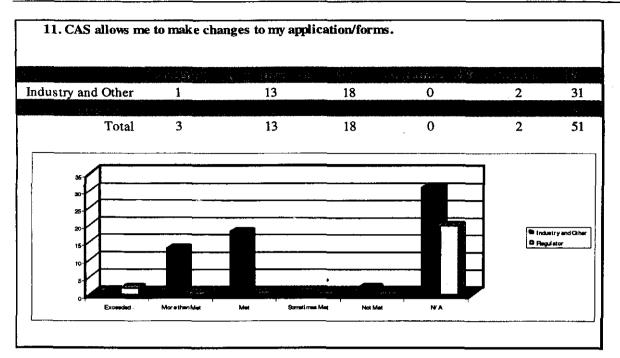


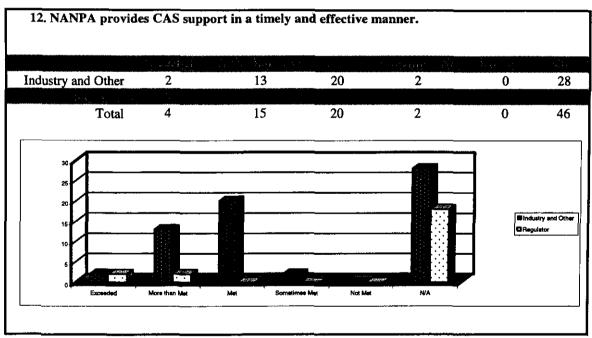


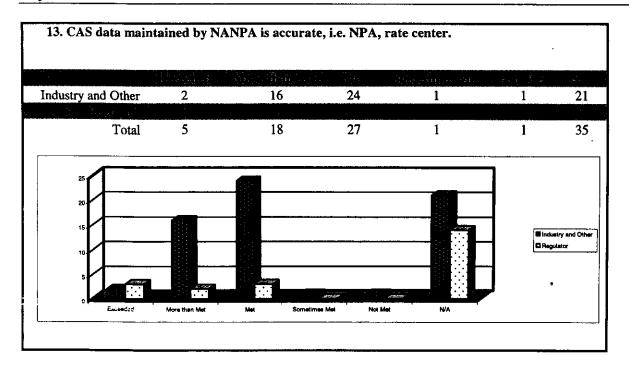






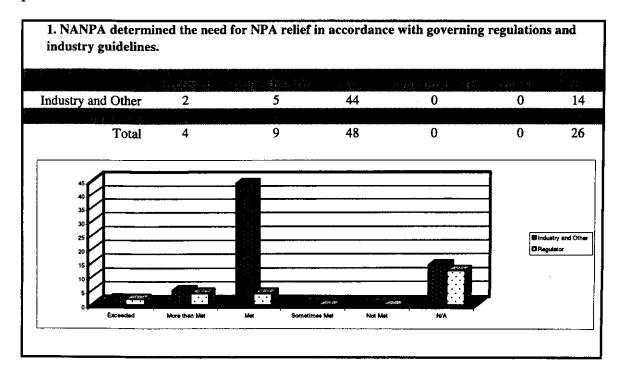


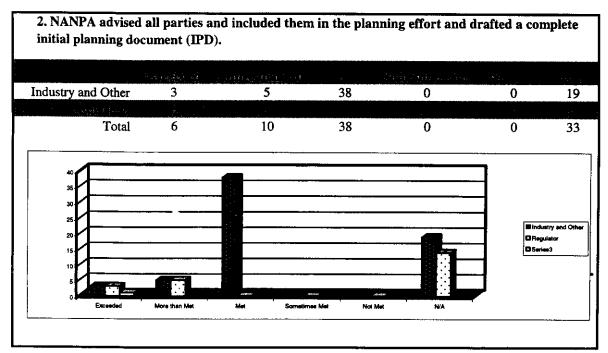


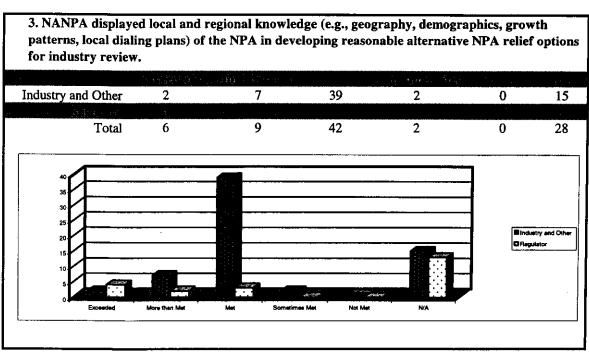


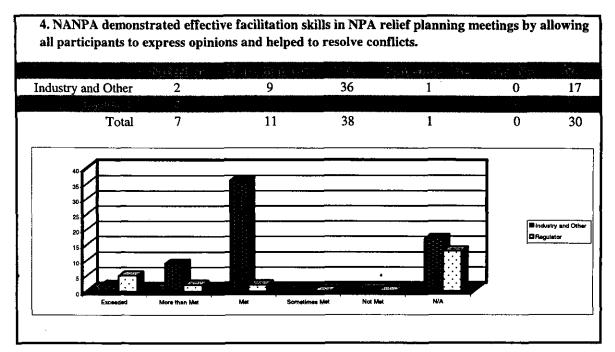
## **NPA Relief Planning (Section B)**

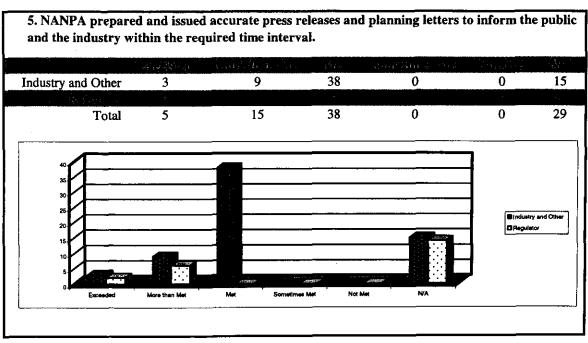
There were 7 questions in this section, which respondents provided ratings that were weighted in the Met and More than Met range. There were over 40 cumulative responses rating NANPA's performance in this section as Exceeded.

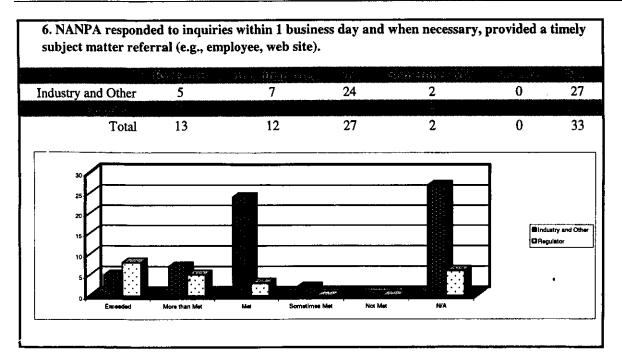


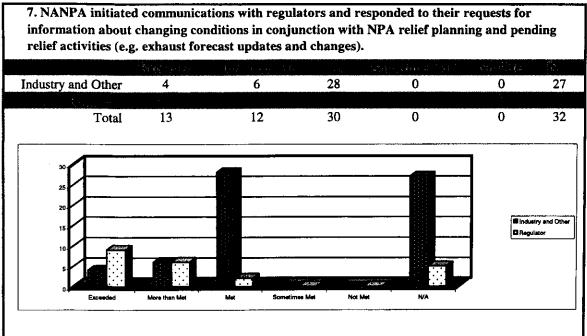






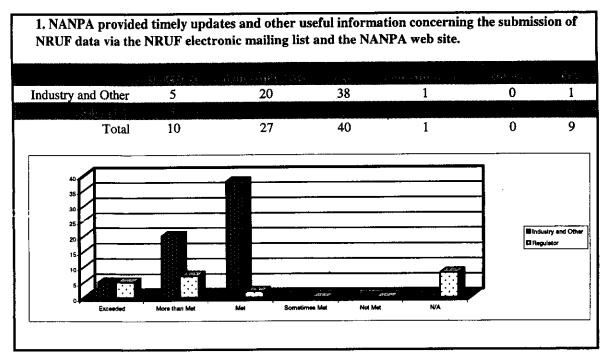


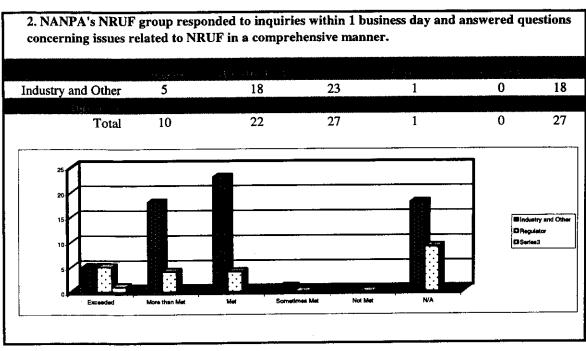


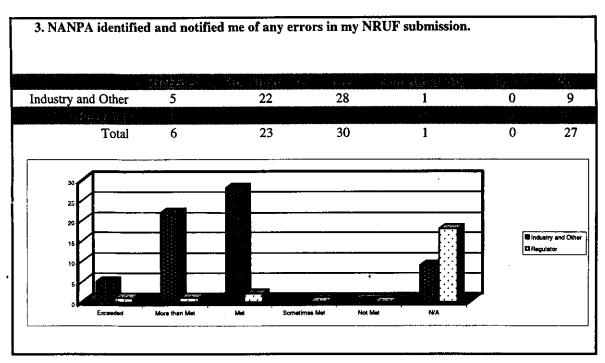


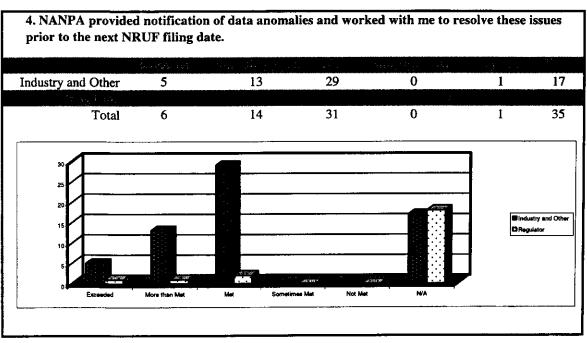
# Numbering Resource Utilization and Forecast (NRUF) (Section C)

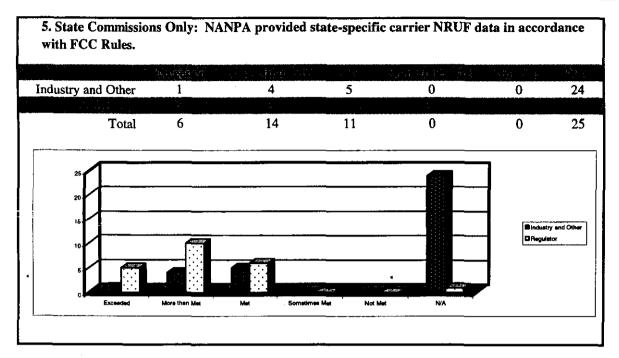
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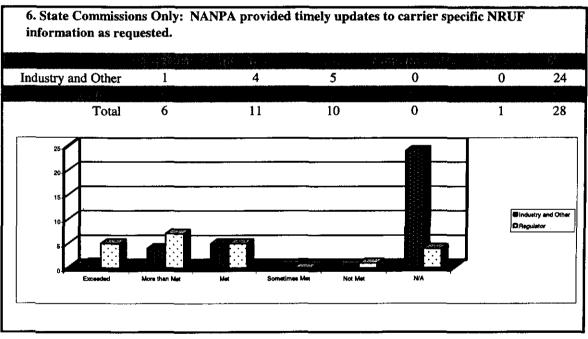


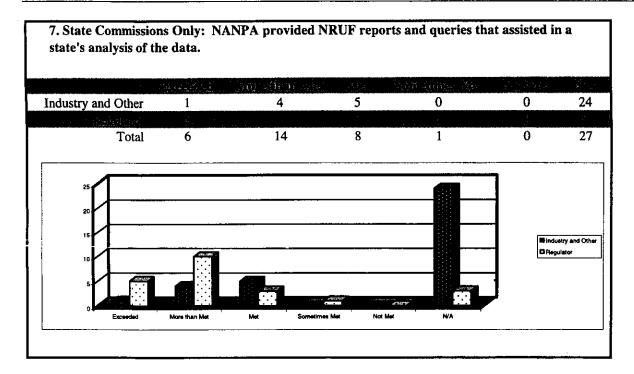






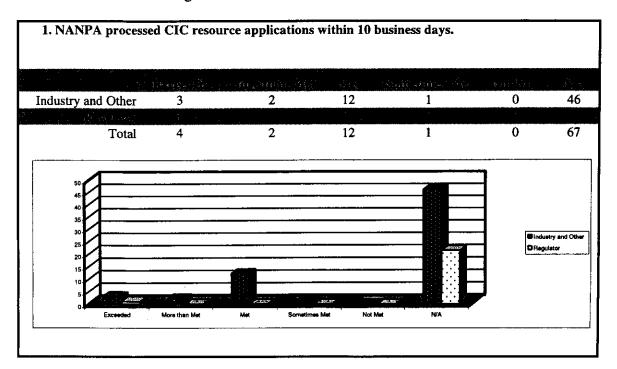


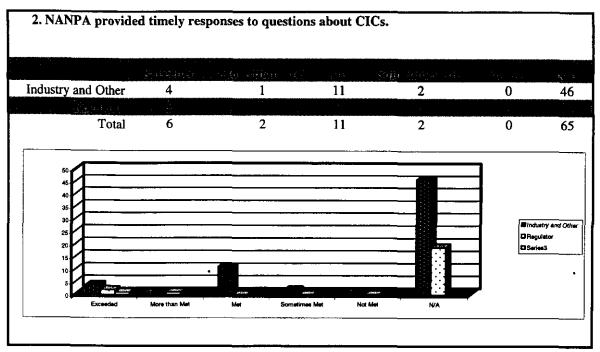


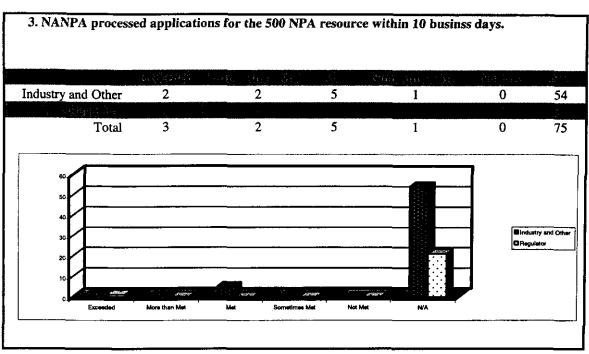


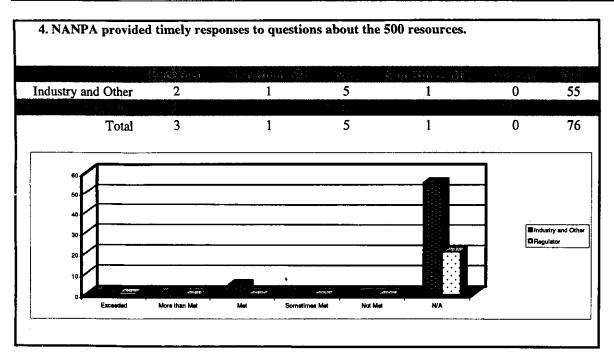
#### Other NANP Resources (Section D)

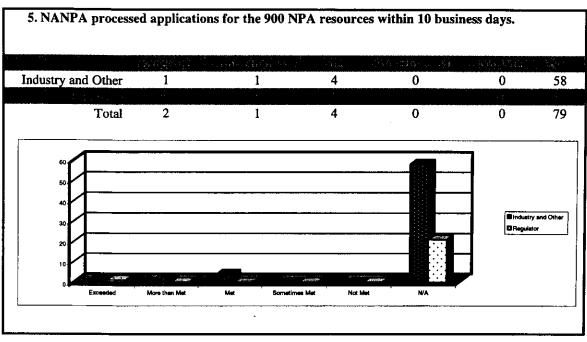
There were 8 questions in this section, which respondents provided ratings that were weighted in the Met and Exceeded range.

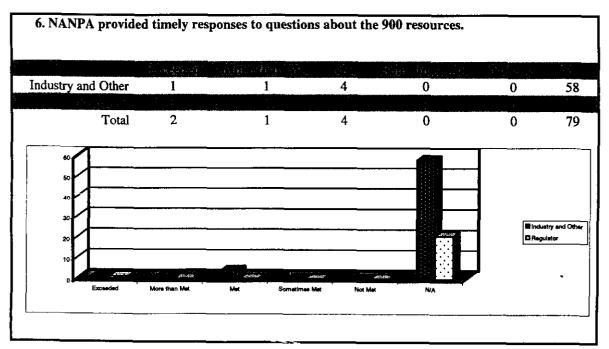


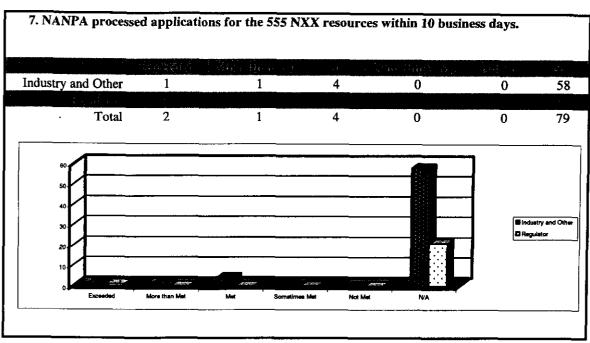


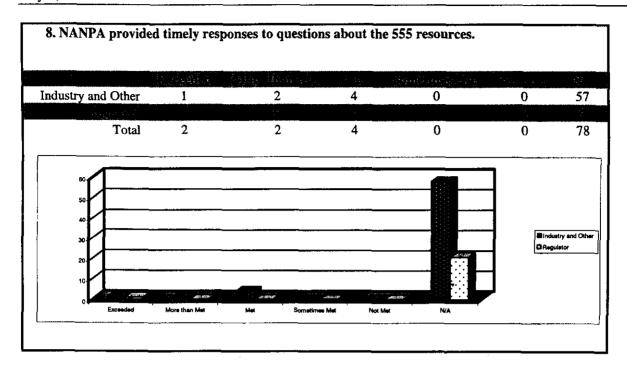






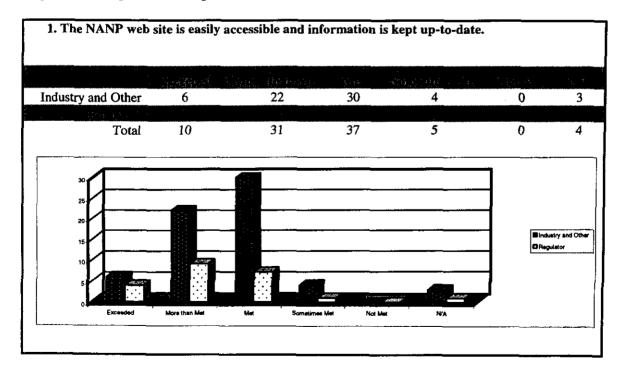


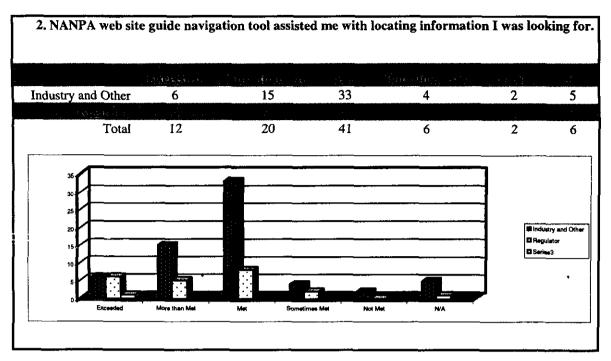


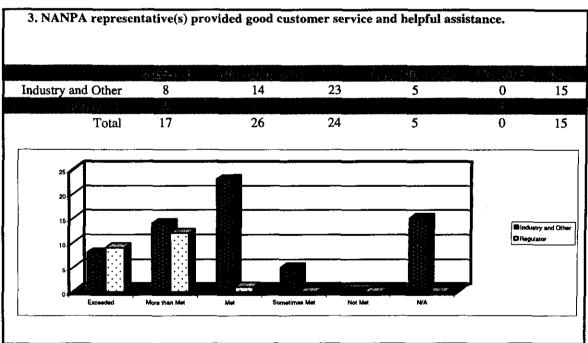


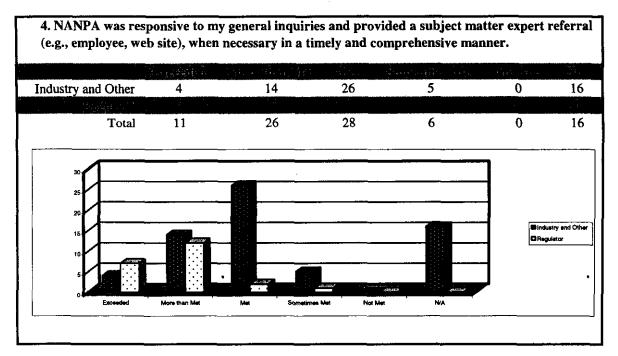
## Overall Assessment of the NANPA (Section E)

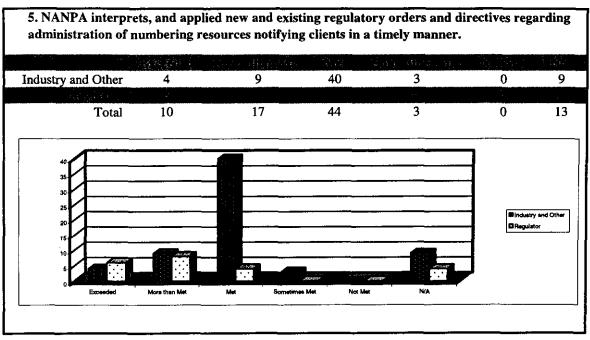
There were 9 questions in this section, which respondents provided ratings. A majority of the respondents rated NANPA in the Met or More than Met range, with over 75 cumulative responses rating NANPA's performance in this section as Exceeded.

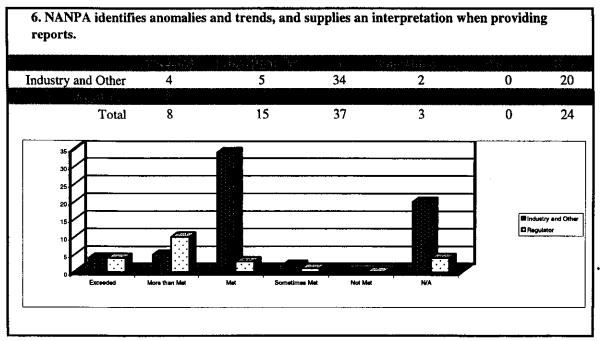


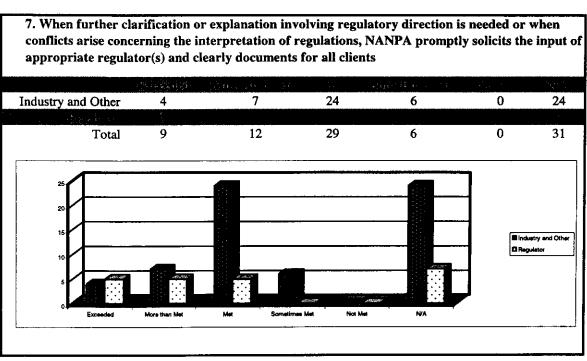


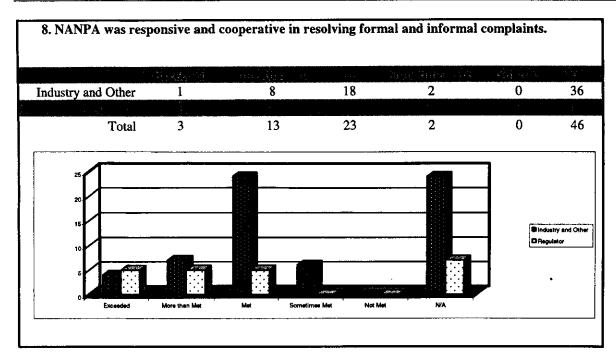


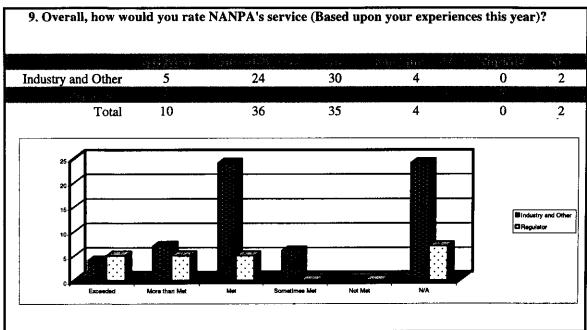












#### 4.2 Written Comments

NOWG reviewed all comments to determine if there was a common theme substantiated by multiple respondents. Comments generally provide respondents with an opportunity to provide details regarding their satisfaction or dissatisfaction.

Following is a summary of written comments that were provided by survey respondents:

- Individual comments did not indicate any broad or specific dissatisfaction other than isolated incidences.
- The only notable comments centered on reclamation and code administration communications.

The NOWG concluded that the written comments were not indicative of any NANPA performance issues and in some cases provide significant praise for individual NANPA staffers. Samples of the written comments received are provided below:

"NANPA staff are always ready to assist with any inquiries we have. They are courteous, promot and professional with their responses, and a pleasure to work with."

"The presentation by NANPA of timely training sessions, conference calls, trade update memos, etc., speak very well of the commitment being made to serve the telecommunications industry at large."

"The staff who handle NRUF at NANPA are really great to work with and efficient and reply back in a very timely Manner."

"NANPA continues to improve in their role of providing services to the industry."

"This must be one of the hardest data bases in the country to maintain and I applaud your efforts."

"We are always impressed with NANPA's quick response and think that they walk on water."

#### 4.3 Reclamation

Several regulatory respondents indicated that there were inaccuracies in the reclamation data sent by NANPA to the commissions. The inaccuracies are that NANPA reports to the commissions a failure to activate NXX(s); however, the service providers have been able to provide the commissions with information that the NXX(s) have been activated (e.g. copy of Part 4 submitted to NANPA).

The reclamation process is outlined in the INC CO Code Administration (NXX) Assignment Guidelines [COCAG] (95-0407-008), Section 8.2.2. Upon researching this, the NOWG has determined that the reclamation process implemented by NANPA has created a "gap" between the date the Part 4 becomes delinquent and the date the delinquent Part 4 list is created and provided to the state commissions and FCC.

Some of the issues that have been identified due to this time gap are:

• Delinquent Part 4s cannot be submitted to NANPA without approval from the FCC or a state commission

- Some state commissions will not accept a delinquent Part 4 until they receive the delinquent Part 4 listing report from NANPA
- Some state commissions will not allow extensions to be requested until the delinquent Part 4 listing report is received from NANPA

There are several reasons why a service provider might miss a Part 4 due date. Some examples are:

- Technical problems (trunking, interconnection agreements, etc.) have arisen and the code holder was unable to put the NPA-NXX into service.
- Area of responsibility is given to someone else in the company and ignores the NANPA notice or the individual has left the company.

If the service provider gets an extension granted, NANPA must have a notice from state commission / FCC in writing (email is acceptable) to update CAS (currently NAS).

If no extensions are sent, NANPA must wait for direction from the FCC or appropriate state commission before continuing with the reclamation process. After NANPA gets a notice from commission/FCC to reclaim a code, NANPA sends a listing to the Traffic Routing Administration to update the appropriate records with the disconnect date. This list is sent prior to the letter being sent to notify the SP of the disconnect date.

The reclamation process was discussed by NANPA and the NOWG – at length – during the Operational Review. NANPA suggested that a training class might help alleviate any confusion.

The NOWG in reviewing survey comments and discussing the issue with NANPA recommends the approach of further education and awareness to the industry in resolving the issue by using the following tools:

- Initiate a Code Administration Tip to advise of the gap created by the delinquent Part 4
  process
- Update the reclamation section in the COCAG to advise of the gap created by the delinquent Part 4 process
- Update the reclamation section on the web site to advise of the gap created by the delinquent Part 4 process

#### 4.4 Conclusion

The NANPA successfully addressed many issues during the year 2003. Some issues resulted in changes to the Central Office Code Administration Guidelines (COCAG) since the situations creating the need for change were unanticipated by the industry and NANPA. Other issues were resolved quickly by NANPA with little or no interaction with the NOWG and/or other groups.

The following comment is noteworthy for continuous improvement:

 NANPA should work with the industry and regulatory community to improve the reclamation reporting process. According to survey respondents NANPA has more than met performance expectations for 2003. In some cases NANPA has even exceed performance expectations.

#### Section 5.0 Operational Review

The NOWG members met with NANPA representatives in Sterling VA on March 9 – 11, 2004 to conduct the annual operations review of the NANPA. During the operational review, there were formal status presentations for Central Office Code Administration, Other NANP Resource Administration, NPA Relief Planning, NRUF, NANPA forum attendance and other activities. NANPA presentations shared at this meeting can be found in Appendix E.

Some of the highlights presented to the NOWG were:

- Operating under a new contract and existing contract
- The NANPA procurement and contract award
- Development of the new NAS
- Changes in NANPA management
- Throughout all the changes NANPA continued to maintain excellent customer service

The following summarizes highlights of specific areas within the NANPA:

- 1. NANPA's Central Office Code Administration presentation contained the following detail:
  - Delivered consistently high quality service
  - All Code application errors identified when responding to applicant (this is an improvement from NOWG suggestion identifying all errors at one time)
  - Provided Part 1 and Part 3 reports to state commissions
  - Database comparison between CAS/LERG/NRUF
    - Reduction in total discrepancies in 2003 of 69.53%
    - Benefits gained from data integrity
  - Quality results showed a high operational performance level
  - Consistently provided on time reports to commissions and industry on code assignments
- 2. NANPA's Other NANP Resources presentation contained the following detail:
  - Continued to assign other resources on time in an efficient manner
  - CIC abandonment continuing to be an area that needs further work
  - 500 code issues are still pending and awaiting resolution from the FCC
- 3. NANPA"S NPA Relief Planning presentation contained the following detail:
  - Relief planning activities slowed in 2003 due to pooling and the return of codes
  - State Commissions have been getting more involved in numbering issues and continued to monitor relief exhaust in their respective states
  - NANPA worked with states and industry to rescind jeopardies and withdraw relief plans
  - NANPA reviewed the aging relief petitions and responded according the direction of the respective state commission
  - At the request of state commissions, 10 meetings were held that addressed unavailable CO codes, their restrictions, and release for assignment.

- Results from NANPA's generated surveys (quarterly), for relief planning meetings and conference calls, demonstrated a continued high level of satisfaction with their facilitation skills
- Met all quality measurements [ 100% ]
- 4. NANPA'S NRUF presentation contained the following detail:
  - NANPA revised performance measurements with NOWG direction which involved providing detailed description of each of the measurements. Also distinguished between missing utilization and anomalous data.
  - Used NRUF data to assist in CAS/LERG/NRUF data discrepancy report cleanup
  - Initiated changes and improvements to the NRUF reporting process, which included State refresher training, Service Provider review sessions, and updates to the job aids.
- 5. NANPA'S Forum and Other Activities presentation contained the following detail:
  - Provided monthly reports to the NOWG
  - Provided bi-monthly reports to the NANC
  - Actively participated at INC by submitting six (6) new issues and providing twelve (12) contributions

#### 6. Other

- Provided overview of the new NANP Administrative System (NAS)
- Provided overview of the updated NANPA web site
- Conducted user testing in late 2003 of the new NAS this provide SP input on design and use prior to rollout of the new system in February 2004.
- Due to the FCC number optimization efforts, the demand for NXX codes and area code relief has diminished.
- It is worthy to note, as stated in the NANPA operations review, there were no applicable formal complaints in 2003.

#### 5.1 Summary of NANPA Operational Review

Although the demand for NXX codes and area code relief has diminished due to the impact of FCC number optimization efforts, the NANPA continues to maintain their high level of performance as demonstrated in the 2003 Overview shared by the NANPA at the operational review. It is worthy to note, as stated in the NANPA operations review, there were no applicable formal complaints in 2003.

# Section 6.0 Code Administration System (CAS) and Number Administration System (NAS)

In 2003, CAS continued to be a valuable database for service providers and regulators. Approximately 50% of all applications were being submitted via CAS. A significant number of the manual applications that required input into CAS by the NANPA were pass throughs from the Pooling Administrator for full code assignments, LRN requests and pool replenishment for NPAs that were in pooling.

There was a total of 90 CAS trouble tickets processed in 2003 with less than 25% related to system functionality issues. At the end of 2003 there were no open trouble tickets.

The NANPA prepared and distributed a CAS survey to users of the database in May 2003. There were 39 responses to the survey and the qualitative comments provided positive comments on the ease to use and navigate through CAS. Support from NANPA was also noted as positive. As with the last survey, it was noted that the MTE section of CAS still does not allow negative numbers. NANPA categorized the suggestions from the CAS survey into "Development", "Education", and "Process/Guideline Change". Three of the development items were identified from the previous CAS survey. The educational items where applicable will be added to CAS TIPS.

All CAS enhancements for 2003 were put on hold with the NANPA procurement.

With the new NANPA contract, a new database (NAS) was developed to meet FCC technical requirements. Internal system testing was conducted in mid 4<sup>th</sup> Quarter 2003 and user acceptance testing was conducted in December 2003.

NAS is scheduled to go into production in 1st Quarter 2004.

#### Section 7.0 Conclusion and Recommendation

The NANPA Performance Evaluation Rating is based upon observation, documentation and information collected during the year 2003. Although emphasis is given to the numeric and written survey comments, survey respondents may not be familiar with the "behind the scene" activities of NANPA. NANPA's performance when working with the NOWG and NANC, including the progress in addressing and resolving the 2003 PIP, are examples of activities, which the average survey respondent may have little or no knowledge of.

It is the opinion of both the NOWG and NANPA Users who responded to the survey, that NANPA achieved between a "More Than Met" and "Exceeded" rating for the performance year 2003.

MORE THAN MET	<ul> <li>Met and sometimes went beyond the requirements for the position.</li> <li>Sometimes provided more than what was required to be considered fully successful in all aspects of the position.</li> <li>Performance was more than competent and reliable.</li> <li>Decisions and recommendations were sound in routine areas, and were frequently sound in the less structured, non-routine areas.</li> </ul>
EXCEEDED	Exceeded performance requirements consistently.  Exceeded performance even in the most difficult and complex situation  Taking on responsibility for extra or unique tasks.  Decisions and recommendations were always sound and exceeded requirements in less structured, non-routine areas of responsibilities.

The NOWG believes the high level of client satisfaction revealed in the survey results is due to the perseverance, outstanding professionalism and expertise exhibited by NANPA personnel when performing their NANPA duties.

- NANPA's cooperation with the NANC, the FCC and State Regulators has been exceptional.
- NANPA has displayed the leadership, initiative and expertise as the custodian of numbering resource goals in every aspect of their involvement.

As with every service, from time to time there may be a customer who misunderstands the code assignment/relief process or has a bad experience. However, the NOWG has no reason to believe that any other organization would not have experienced the same situations or that there would be any guarantee that another organization would have handled the situations any better than how it was handled by NANPA personnel.

# Section 8.0 Acknowledgements & NOWG Participants

The NOWG wishes to thank the following NeuStar NANPA employees for assisting the NOWG during the annual operational review and with participating in the NOWG's monthly meetings.

Cocke, Joe Fears, Nancy Foley, Tom Franlin, Joe Manning, John Milby, Wayne Sprague Beth, Tokarek, Sandy

# **List of NOWG Participants**

The following list contains working group members who have participated in varying degrees in the development of this document.

Participant	<b>Company</b>
Bennett, Bruce	Qwest
Castagna, Jim	Verizon
Neumann, Julie	AT&T Wireless
Edelman, Joanne	Verizon Wireless
Emmer, Rosemary	Nextel
Hustead, Paula	ALLTEL
LaGattuta, Paul	AT&T
Mulberry, Karen	MCI
O'Donnell, Beth	Cox Communications
Riepenkroger, Karen	Sprint

# Section 9.0 List of Appendices

- A. NOWG/NANPA Standing Agenda
- B. 2003 PIP
- C. Blank 2003 Survey
- D. Survey Results Comments
- E. NANPA 2003 Operational Review Presentations

The following appendix has been provided to the FCC, NANPA, and the NANC Chair. It is available upon request to any other interested party.

- F. List of Survey Respondents
- G. 2003 NANPA Survey Responses